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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No. 3:23-md-03084-CRB

**PLAINTIFF A.R.'S STATEMENT RE:  
SOCIAL MEDIA PRODUCTION  
DISPUTE**

This Document Relates to:

*Plaintiff A.R. v. Uber Technologies, Inc.,  
et al., Case No. 3:24-cv-01827*

On June 6, 2025, the parties filed their Joint Discovery Letter Brief Regarding Bellwether Plaintiff A.R.2 And Social Media Production [ECF 3191]. After that joint filing, and prior to this Court's Order Resolving Case-Specific Discovery Disputes Regarding Social Media [ECF 3209], the parties agreed to move A.R.'s deposition to July 1, 2025. The Court was unaware of the parties' agreement to move A.R.'s deposition to July 1, and the Court ordered (1) Plaintiff to appear for deposition no later than June 23, 2025 and (2) the parties to meet and confer "regarding prompt deadlines for the production of social media materials and a date for Plaintiff's deposition. *See* Dkt.

3209, p.8:1-6. No later than June 11, 2025, the parties were ordered to file “either a stipulation and proposed order setting that schedule, or a joint statement of each party’s position, without argument. *See id.*

On June 10, 2025, counsel for the parties met and conferred via videoconference. Defendants agreed that, so long as the Court had no objection, Plaintiff would be permitted to appear for her deposition on July 1, 2025, as the parties had previously agreed to. Indeed, several case-specific discovery agreements were discussed and resolved between the parties during the Court’s in-person meet and confer on June 9 based on A.R.’s deposition occurring on July 1. However, during the June 10 discussion on Plaintiff A.R.’s deadlines, the parties were unable to come to an agreement for the timeline of Plaintiff’s production of social media materials.

Plaintiff’s proposed schedule<sup>1</sup> is based on the Court ordered timing and deadlines from the other Wave 1 bellwether social media production. ECF 3209. Plaintiff submits this statement outlining the positions regarding the schedule related to Plaintiff A.R.’s social media production in advance of her deposition:

	<b>Plaintiff’s Position<sup>2</sup></b>	<b>Defendant’s position</b>
Plaintiff’s deadline to make social media production	June 20, 2025	June 18, 2025
Defendants’ deadline to provide validation parameters	June 23, 2025	June 19, 2025
Plaintiff’s deadline to make production of validation materials	June 25, 2025 (3 business days prior to deposition)	June 23, 2025 (5 business days prior to deposition)
Plaintiff’s deposition	July 1, 2025	July 1, 2025

<sup>1</sup> At 8:02 am PST, Plaintiff’s counsel sent edits to Defendants proposed Joint Statement, but did not receive a response until 9:29 am PST which noted continued disagreement.

1 Dated: June 11, 2025

Respectfully submitted,

2 By: /s/ Rachel B. Abrams  
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*Counsel for Plaintiff A.R.2*

10 **ATTESTATION**

11 Pursuant to Civil Local Rule 5-1(h)(3), I hereby attest that all signatories listed, and on  
12 whose behalf the filing is submitted, have authorized the filing.

13 Dated: June 11, 2025

14 By: /s/ Rachel Abrams  
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